LPDES PERMIT NO. LA0124401 (Agency Interest No. 159541)

LPDES REVISED STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

I. Company/Facility Name: Petroplex International, L.L.C.
Petroplex International, L.L.C. Tank Farm
842 Main Street
Baton Rouge, Louisiana 70802

II. Issuing Office: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Water Permits Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

III. Prepared By: Paula M. Roberts
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Date Prepared: May 3, 2011

IV. Permit Action/Status:

A. Reason for Permit Action:

Proposed initial issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2365/40 CFR 122.46.

B. LPDES permit: N/A, first time permit issuance

C. Application submittal date: Application submitted on August 26, 2008. Environmental Assessment Statement submitted November 10, 2008. Updated information was submitted and received on February 25, 2011.

V. Facility Information:

A. Location – 1407 La. Hwy. 18 in Vacherie, Louisiana
(Latitude 30°01'13", Longitude 90°42'08")

B. Applicant Activity –

According to the application, Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm will supply a stable stock of petroleum commodities to serve local and regional refiners and distributors. Liquid commodities will be received and offloaded by barge, ship, rail, pipeline, and tanker trucks. The commodities will be stored in above ground storage tanks. The primary commodities to be stored and distributed will include gasoline, light crude oil, heavy crude oil, ethanol, light petroleum distillates, mid petroleum distillates, heavy residual oils, vegetable oil, and bio-diesel.

The facility infrastructure will include steam generating equipment used to heat viscous materials in tank and piping to sustain flow; a wastewater treatment system designed to treat industrial wastewater generated at the facility; a sanitary wastewater treatment unit and diesel powered internal combustion engines for back up power and pump capacity.

Tank draws, stormwater from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate, facility tank wash water and other miscellaneous oily water streams that may be generated during equipment maintenance and operation will be stored in the facility "slop tank." This water will then be sent to the facility wastewater treatment tank. This wastewater will be routed to the stormwater retention pond and discharged to the Mississippi River via Outfall 001.

Boiler blowdown and steam condensate will be discharged through an internal outfall and routed to the stormwater retention pond and discharged the Mississippi River via Outfall 001.

Hydrostatic test waster from clean tanks will be discharged from the tank into internal ditches or pipes and routed to the stormwater retention pond where it will be pumped and discharged to the Mississippi River via Outfall 001.

Sanitary wastewater from bathrooms, showers, sinks and breakroom kitchens will be treated on-site and discharged through an internal outfall to the retention pond where it will be pumped and discharged to the Mississippi River via Outfall 001.

The facility will utilize a vapor recovery system to reclaim loading vapors and a thermal oxidizer will control air emissions of vapors not collected by the vapor recovery unit.

Stormwater from non process areas will be collected in a system of internal ditches within the facility and flow south towards Hwy. 3127. The internal ditch discharges to a ditch along Hwy. 3127 as it intersects a culvert running beneath Hwy. 3127. The culvert flows into Bayou Lassene and thence into Lac Des Allemands.

C. Technology Basis - (40 CFR Chapter 1, Subchapter N, Effluent Guidelines and standards, Parts 401, and 405-471 have been adopted by reference at LAC 33:IX.4903.

Technology limitations in the draft permit are based upon best professional judgment (BPJ) and current office practices for similar discharges from LPDES General Permits LAG480000, LAG670000 and LAG540000.

D. Fee Rate -
1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 5171, 4226

VI. Receiving Waters: Mississippi River (Outfalls 001 and Internal Outfalls 101, 201, 301, and 401); Lac Des Allemands (Outfall 002)

A. River Basin and Subsegment: Mississippi, 070301
B. Designated Uses: primary contact recreation, secondary contact recreation, and fish and wildlife propagation, drinking water supply

A. River Basin and Subsegment: Barataria, 020202
B. Designated Uses: primary contact recreation, secondary contact recreation, and fish and wildlife propagation

VII. Outfall Information:

Outfall 001

A. Type of wastewater – The intermittent discharge of tank draw wastewater from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate, tank and equipment washwater from Internal Outfall 101, boiler blowdown and steam condensate from Internal Outfall 201, hydrostatic test wastewater from Internal Outfall 301 and treated sanitary wastewater from Internal Outfall 401

B. Location – At the point of discharge from the retention pond prior to combining with other waters (Latitude 30°01'17", Longitude 90°42'11")

C. Treatment – none

D. Flow – Intermittent, 310,000 GPD

E. Receiving waters – effluent pipe, thence into the Mississippi River

F. Basin and segment – Mississippi River Basin, Segment 070301

Internal Outfall 101

A. Type of wastewater – The intermittent discharge of tank draw water from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate and tank and equipment washwater

B. Location – At the point of discharge from the last treatment unit prior to combining with other waters at Outfall 001 (Latitude 30°00'14", Longitude 90°41'42")

C. Treatment – aerated biological activated sludge
– Solid settlement

D. Flow – Intermittent, 140,000 GPD

E. Receiving waters – effluent pipe, thence into the internal holding pond, thence into the Mississippi River via Outfall 001

F. Basin and segment – Mississippi River Basin, Segment 070301

Internal Outfall 201

A. Type of wastewater – The intermittent discharge of boiler blowdown and steam condensate

B. Location – At the point of discharge from three boilers thence into internal ditches prior to combining with other waters at Outfall 001 (Latitude 30°00'46", Longitude 90°41'51")

C. Treatment – none

D. Flow – Intermittent, 5000 GPD

E. Receiving waters – effluent pipe, thence into the internal holding pond, thence into the Mississippi River via Outfall 001

F. Basin and segment – Mississippi River Basin, Segment 070301

Internal Outfall 301

A. Type of wastewater – The intermittent discharge of hydrostatic test wastewater

B. Location – At the point of discharge from the piping or vessel being tested prior to combining with other waters at Outfall 001 (Latitude 30°00'52", Longitude 90°41'59")

C. Treatment – none

D. Flow – Intermittent, 150,000 GPD

E. Receiving waters – Mississippi River via Outfall 001

F. Basin and segment – Mississippi River Basin, Segment 070301

Internal Outfall 401

A. Type of wastewater – The intermittent discharge of treated sanitary wastewater

B. Location – At the point of discharge from the last treatment unit prior to discharge into the internal holding pond and combining with other waters at Outfall 001 (Latitude 30°01'00", Longitude 90°42'00")

C. Treatment – aerated biological activated sludge
– solid settlement
– disinfection

D. Flow – Intermittent, 6000 GPD

E. Receiving waters – effluent pipe, thence into the internal holding pond, thence into the Mississippi River via Outfall 001

F. Basin and segment – Mississippi River Basin, Segment 070301

Outfall 002

A. Type of wastewater – The intermittent discharge of uncontaminated stormwater runoff from non-process areas for the entire site

B. Location – At the point of discharge from the internal ditches within the facility prior to combining with other waters (Latitude 29°58'55", Longitude 90°41'13")

C. Treatment – none

D. Flow – Intermittent, flow is variable

E. Receiving waters – into internal ditches, thence into the Parish drainage ditch, thence into Bayou Lasseigne, thence into Lac Des Allemands

F. Basin and segment – Barataria Basin, Segment 020202

VIII. Proposed Changes from the Previous Draft Permit:

A) The following effluent limitations have been removed from Internal Outfall 101 and added to the external Outfall 001: Total BTEX, Benzene, and Total Lead.
B) Monthly Average effluent limitations have been added to Internal Outfall 401 for BOD_5, TSS and Fecal Coliform. Also, the frequency as been increased to 1/3 months.
C) The word Internal was added before Outfall 101 on page 3 of 7, in Part I of the revised permit.
D) The Discharge Monitoring Reports language was updated in Part II, Paragraph E.
E) An updated Part III attachment has been added to the revised permit.
F) Paragraph J. Interior Tank Pressure Washing requirements have been added to the revised permit.
G) The fee rating worksheet has been updated and the fee points have been recalculated and reflected in the Revised Fee Rating Worksheet.
H) MQLs section has been added to Part II of the permit.

IX. Proposed Permit Limits and Rationale:

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

Outfall 001 – Intermittent tank draw wastewater from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate, tank and equipment washwater from Internal Outfall 101, boiler blowdown and steam condensate from Internal Outfall 201, hydrostatic test wastewater from Internal Outfall 301 and treated sanitary wastewater from Internal Outfall 401

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow (MGD)	Report	Report	1/month
TOC	---	50	1/month

Oil & Grease	---	15	1/month
pH	6.0 s.u. (Min)	9.0 s.u. (Max)	1/month
Total BTEX	---	250 µg/L	1/month
Benzene	---	50 µg/L	1/month
Lead	---	50 µg/L	1/month

EFFLUENT LIMITATIONS BASIS for Outfall 001:

Flow - The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

TOC and Oil & Grease - Limitations are based upon BPJ in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

pH - Requirements are based upon LAC 33:IX.1113.C.1.

Benzene, Total BTEX, and Lead - Limitations are based upon BPJ and office practices for permitting similar outfalls from LPDES General Permit for Light Commercial Facilities (LAG480000-Outfall 004) effective December 1, 2010.

The monitoring frequencies are set at once per month by grab sample for all parameters except for flow. Flow will be recorded on the DMR as an estimated value.

Internal Outfall 101 – Intermittent discharge of tank draw water from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate and tank and equipment washwater

Parameter	**Proposed Permit Limits**		**Monitoring Frequency**
	Monthly Avg mg/L	**Daily Max** mg/L	
Flow (MGD)	Report	Report	1/month
COD	----	125	1/month
TSS	----	45	1/month

Chlorides	----	500	1/month

EFFLUENT LIMITATIONS BASIS for Outfall 101:

Flow - The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

COD and TSS - Limitations are based upon BPJ and office practices for permitting similar outfalls from LPDES General Permit for Light Commercial Facilities (LAG480000-Outfall 002) effective December 1, 2010.

Chlorides - Limitations are based upon BPJ and office practices for permitting similar discharges.

The monitoring frequencies are set at once per month by grab sample for all parameters except for flow. Flow will be recorded on the DMR as an estimated value.

Internal Outfall 201 – Intermittent discharge of boiler blowdown and steam condensate

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow (MGD)	Report	Report	1/month
TSS	30	100	1/month
TOC	---	50	1/month
Oil & Grease	---	15	1/month

EFFLUENT LIMITATIONS BASIS for Outfall 201:

Flow - The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

TOC and Oil & Grease - Limitations are based upon BPJ in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

TSS - Limitations are based upon BPJ and office practices for permitting similar outfalls from LPDES General Permit for Light Commercial Facilities (LAG480000-Outfall 007) effective December 1, 2010.

The monitoring frequencies are set at once per month by grab sample for all parameters except for flow. Flow will be recorded on the DMR as an estimated value.

Internal Outfall 301 – Intermittent discharge of hydrostatic test wastewater

Parameter	Proposed Permit Limits		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow (MGD)	Report	Report	1/discharge event
TOC	----	50 mg/L	1/discharge event
TSS	----	90 mg/L	1/discharge event
Oil & Grease	----	15 mg/L	1/discharge event
pH	6.0 s.u.(min)	9.0 s.u.(max)	1/discharge event
Benzene	----	50 µg/L	1/discharge event
Total BTEX	----	250 µg/L	1/discharge event
Lead	----	50 µg/L	1/discharge event

EFFLUENT LIMITATIONS BASIS for Outfall 301:

Flow, TSS, Oil and Grease, and pH shall be measured on discharges from all new and existing pipelines, flowlines, vessels, or tanks. In addition, Total Organic Carbon (TOC) shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have previously been in service; (i.e., those which are not new). Benzene, Total BTEX, and Total Lead shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.

Flow -This LPDES permit establishes a reporting requirement for monthly average flow and daily maximum flow once per event. These requirements are consistent with LAC 33:IX.2707.I.1.b and the LPDES General Permit for Hydrostatic Test Wastewater, LAG670000 effective February 1, 2008.

TSS - This LPDES permit establishes a daily maximum limitation of 90 mg/L in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000 effective February 1, 2008.

Oil & Grease - This LPDES permit establishes a daily maximum limitation of 15 mg/L in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000 effective February 1, 2008.

Total Organic Carbon (TOC) - This LPDES permit establishes a daily maximum limitation of 50 mg/L in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000 effective February 1, 2008.

Benzene, Total BTEX, and Lead - This LPDES permit establishes a daily maximum limitation of 50 µg/L for Benzene, 250 µg/L for Total BTEX, and 50 µg/L for Lead in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000 effective February 1, 2008.

The monitoring frequencies are set at once per month by grab sample for all parameters except for flow. Flow will be recorded on the DMR as an estimated value.

Internal Outfall 401 – Intermittent discharge of treated sanitary wastewater

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Maximum mg/L	
Flow (MGD)	Report	Report	1/3 months
BOD_5	30	45	1/3 months
TSS	30	45	1/3 months
Fecal Coliform colonies/100 mL	200	400	1/3 months

EFFLUENT LIMITATIONS BASIS for Outfall 401:

Flow - The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

BOD_5, TSS, Fecal Coliform and pH - Limitations are based upon the LPDES Class II Sanitary General Permit (LAG540000-Schedule A) effective June 1, 2008.

The monitoring frequencies are set at once per month by grab sample for all parameters except for flow. Flow will be recorded on the DMR as an estimated value.

Outfall 002 – Intermittent discharge of uncontaminated stormwater runoff

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow (MGD)	Report	Report	1/quarter
TOC	---	50	1/quarter
Oil & Grease	---	15	1/quarter
pH	6.0 s.u. (Min)	9.0 s.u. (Max)	1/quarter

EFFLUENT LIMITATIONS BASIS for Outfall 002:

Flow - The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

TOC and Oil & Grease - Limitations are based upon BPJ in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

pH - Requirements are based upon LAC 33:IX.1113.C.1.

The monitoring frequencies are set at once per month by grab sample for all parameters except for flow. Flow will be recorded on the DMR as an estimated value.

IX. Compliance History/DMR Review:

This is a proposed facility; therefore, there is no current enforcement history available.

X. Endangered Species:

The receiving waterbodies for Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm are Subsegment 070301 of the Mississippi River Basin and Subsegment 020202

of the Barataria Basin. Segment 070301 of the Mississippi River Basin has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as a threatened or endangered species. This draft permit was submitted to the FWS on March 17, 2010 for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). In a response dated March 24, 2010, it was stated that this proposed discharge is not likely to adversely those resources. As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

XI. Historic Sites:

The discharge will be from a proposed facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated October 15, 2008 to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response letter, dated September 25, 2008, states that there is one recorded archaeological site within the property boundaries. Their Office has requested that a Phase I survey be conducted to insure that no significant archaeological sites are impacted upon development. As a result of that survey, SHPO stated in a letter dated December 19, 2009, that the facility as proposed will have no potential effects, however, future development plans will require additional site assessment.

XII. Tentative Determination:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharges described in the application.

XIII. Variances:

No requests for variances have been received by this Office.

XIV. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the revised

statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper(s) of general circulation

Department of Environmental Quality Public Notice Mailing List

XV. TMDL Waterbodies:

The Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm proposes to discharge tank draw wastewater from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate, tank and equipment washwater, boiler blowdown and steam condensate, hydrostatic test wastewater and treated sanitary wastewater into the Mississippi River (Segment 070301). Segment 070301 is not listed on LDEQ's 2006 Final Integrated Report as impaired, and to date no TMDLs have been established.

The facility also discharges uncontaminated stormwater runoff to Segment 020202 of the Barataria Basin. This segment is currently impaired for organic enrichment/low DO and non native aquatic plants. TMDLs for this segment were completed on March 31, 2005. This office has determined that due to the nature of the discharges from Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm Outfall 002, there is no potential to discharge pollutants that could contribute to organic enrichment or non native aquatic plants at levels that could cause or contribute to further impairment of the receiving stream. However, a daily maximum TOC limitation of 50 mg/l has been addressed to ensure no further impairment to the organic enrichment impairment.

A reopener clause will be included in the permit to allow for the establishment of more stringent effluent limitations and requirements as imposed by any future TMDLs.

XVI. Stormwater Pollution Prevention Plan (SWP3) Requirements:

In accordance with LAC 33:IX.2707.I.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. For first time permit issuance, the Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. For renewal permit issuance, the Part II condition requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that contain

duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

XVII. Permit Reopener Clause

The draft permit has incorporated a requirement for the permittee is to submit Tables I, II, III and V of Section III of the LPDES application Form IND no later than two years after the commencement of discharge from the proposed facility as per LAC 33:IX.2501.K.5.f. Upon submittal of the appropriate Items, LDEQ may choose to modify, or alternatively revoke and reissue this permit to change effluent limitations based on the actual reported flow or production. Additionally, the permit may be reopened to incorporate the results of any total maximum daily load allocation, which may be approved for the receiving water body.

XVIII. "IT" Questions - Applicant's Responses

The "IT" Questions along with the applicant's responses can be found in the Environmental Assessment Statement (EAS) dated November 10, 2008 (See EDMS Document ID 6237601). Updated information related to the EAS was submitted and received on February 25, 2011 (See EDMS Document ID 7855927).